

**Katahdin Paper LLC
Penobscot County
Millinocket, Maine
A-406-70-A-I**

**Departmental
Findings of Fact and Order
Part 70 Air Emission License**

After review of the Part 70 License application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 M.R.S.A, Section 344 and Section 590, the Department finds the following facts:

I. Registration

A. Introduction

FACILITY	Katahdin Paper, LLC (The Mill)
LICENSE NUMBER	A-406-70-A-I
LICENSE TYPE	Initial Part 70 License
NAICS CODES	322121
NATURE OF BUSINESS	Paper Mill
FACILITY LOCATION	Millinocket, Maine
DATE OF LICENSE ISSUANCE	February 18, 2004
LICENSE EXPIRATION DATE	February 18, 2009

B. Emission Equipment

The following emission units are addressed by this Part 70 License:

EMISSION UNIT ID	UNIT CAPACITY	UNIT TYPE
Power Boiler #1 (WB1)	370 MMBtu/hr	Fuel Burning, #6 fuel oil, #2 fuel oil, waste oil
Power Boiler #2 (WB2)	370 MMBtu/hr	Fuel Burning, #6 fuel oil, #2 fuel oil, waste oil
Power Boiler #3 (WB3)	370 MMBtu/hr	Fuel Burning, #6 fuel oil, #2 fuel oil, waste oil
Power Boiler #4 (WB4)	740 MMBtu/hr	Fuel Burning, #6 fuel oil, #2 fuel oil
Lift Station Back-up Pump	6.8 MMBtu/hr	Fuel Burning, Diesel
LPG Dryer System	27.3 MMBtu/hr	Fuel Burning, LPG
RMP mill	N/A	Process Equipment
PCC plant	N/A	Process Equipment
Parts Washers	N/A	Process Equipment

The Mill has additional insignificant activities which do not need to be listed in the emission equipment table above. The list of insignificant activities can be found in the Part 70 license application and in Appendix B of Chapter 140 of the Department's Regulations.

C. Application Classification

The application for The Mill does not include the licensing of increased emissions or the installation of new or modified equipment, therefore the license is considered to be an Initial Part 70 License issued under Chapter 140 of the Department's regulations for a Part 70 source.

D. Definitions / Acronyms

BACT – Best Available Control Technology

CEM – Continuous Emission Monitor

COM – Continuous Opacity Monitor

MACT – Maximum Achievable Control Technology

NSR – New Source Review

PCC – Precipitated Calcium Carbonate

II. EMISSION UNIT DESCRIPTION

A. Power Boilers #1 & #2 (WB1 & WB2)

WB1 and WB2 were manufactured by Combustion Engineering with maximum design heat inputs of 370 MMBtu/hr. These boilers are licensed to fire #6 fuel oil, #2 fuel oil, and waste oil. The sulfur content of the fuel oil fired shall not exceed a maximum fuel sulfur content of 2.0% by weight.

These boilers were installed in 1957, prior to the New Source Performance Standards (NSPS) Subparts D, Da, and Db applicability dates.

WB1 and WB2 are located at a major source of Hazardous Air Pollutants (HAPs) and may therefore be subject to the forthcoming National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters (40 CFR Part 63, Subpart DDDDD).

WB1 and WB2 are each equipped with low NO_x burners and a Foxboro IA Digital Control System.

WB1 and WB2 each operate a CEMS for NO_x on their respective exhausts. Emissions from WB1, WB2, WB3, and WB4 exit through a combined 348-ft stack (power boiler stack). A COM is operated on the combined power boiler stack. WB1 and WB2 are also each equipped with individual COMs.

The combined power boiler stack is large and when only one boiler is exhausted into the stack, the gases sometimes cool to the point of condensing. The condensation causes the combined power boiler stack COM to record values that are not necessarily representative of the exhaust opacity. Particulate matter stack test results have shown that the facility is within its limits, even with higher opacity stack meter readings. Therefore, when only one boiler (WB1, WB2 or WB4) is operating the individual boiler COM may be used to demonstrate compliance. The opacity at the individual boiler COM shall be corrected to the corresponding opacity at the exit of the combined power boiler stack.

The Mill operates boilers WB1, WB2, WB3, and WB4 below 50% of the boiler load capacity that the combined power boiler stack was designed for (based on a 12-month rolling total). Therefore, The Mill is subject to a less stringent opacity standard per MEDEP Chapter 101, Section 2(B)(5)(iii). Should The Mill request an increase in the facility wide fuel limit, a more stringent opacity limit would be required.

Streamlining

1. Opacity
MEDEP Chapter 101, Section 2(B)(5) and Section 3 contain the only applicable opacity standard for the combined emissions from the power boiler stack. **No streamlining requested.**

2. PM
 - a. MEDEP Chapter 103, Section 2(A)(1) contains the only applicable PM lb/MMBtu emission standard.
 - b. 40 CFR Part 63, Subpart DDDDD has not been promulgated as of the date of this license. However, the final rule may contain PM lb/MMBtu emission standards which are applicable to this equipment.

Currently, no streamlining is requested. However, The Mill may request streamlining for PM lb/MMBtu to MEDEP Chapter 103 or 40 CFR Part 63, Subpart DDDDD, whichever is the more stringent standard, once the emission limits of Subpart DDDDD come into effect.

- c. BPT establishes the only applicable PM lb/hr emissions limit.
No streamlining requested.

3. PM₁₀

BPT establishes the only applicable PM₁₀ lb/MMBtu and lb/hr emission limits. **No streamlining requested.**

4. SO₂
 - a. MEDEP Chapter 106, Section 2(A)(2) contains the only applicable fossil fuel sulfur content standard. **No streamlining requested.**
 - b. BPT establishes the only applicable SO₂ lb/MMBtu and lb/hr emission limits. **No streamlining requested.**

5. NO_x
 - a. WB1 and WB2 are both equipped with low NO_x Burners for control of NO_x emissions. The low NO_x Burners meet the requirement in MEDEP Chapter 138 Section 3(B)(1) to operate a low NO_x burner or equivalent strategy. Therefore, the lb/MMBtu standard in MEDEP Chapter 138 does not apply to these boilers.
 - b. BPT establishes the only applicable NO_x lb/MMBtu and lb/hr emission limits. **No streamlining requested.**

6. CO

BPT establishes the only applicable CO lb/MMBtu and lb/hr emission limits. **No streamlining requested.**

7. VOC

BPT establishes the only applicable VOC lb/MMBtu and lb/hr emission limits. **No streamlining requested.**

Periodic Monitoring

Periodic monitoring shall consist of record keeping which demonstrates fuel use and delivery receipts or other records from the supplier indicating the percent sulfur by weight of the fuel oil.

The Mill shall stack test WB1 and WB2 for PM in accordance with 40 CFR Part 60, Appendix A, Method 5 by December 31, 2004 and every two years thereafter.

Based on best management practices and the type of fuel for which WB1 and WB2 were designed, it is unlikely that these boilers will exceed the emission limits for CO and VOC. Therefore, periodic monitoring by the source for these pollutants is not required. However, neither the EPA nor the State is precluded from requesting the Mill to perform testing and may take enforcement action for any violations discovered.

Parameter Monitors

There are no Parameter Monitors required for WB1 or WB2.

CEMS and COMS

1. MEDEP Chapter 117 contains an applicable requirement to monitor opacity and NO_x emissions.
2. MEDEP Chapter 138 contains an applicable requirement to monitor NO_x lb/MMBtu emissions.

Based on the above, The Mill shall operate a CEMS which provides data to calculate NO_x lb/MMBtu and %CO₂ from WB1 and WB2.

When more than one boiler is operating, opacity from the power boiler stack shall be monitored by a COMS except during periods of startup as allowed by Condition (18). Monitoring of the power boiler stack opacity meets the requirements of MEDEP Chapter 117 to monitor opacity from WB1 and WB2.

When only one boiler is operating, the individual boiler COM may be operated and the output corrected to the corresponding opacity at the exit of the power boiler stack.

Control Equipment

Control equipment for WB1 and WB2 consists of the low NO_x burners.

B. Power Boiler #3 (WB3)

WB3 was manufactured by Combustion Engineering with a maximum design heat input of 370 MMBtu/hr. This boiler is licensed to fire #6 fuel oil, #2 fuel oil, and waste oil. The sulfur content of the fuel oil fired shall not exceed a maximum fuel sulfur content of 2.0% by weight.

WB3 was installed in 1957, prior to the New Source Performance Standards (NSPS) Subparts D, Da, and Db applicability dates.

WB3 is located at a major source of Hazardous Air Pollutants (HAPs) and may therefore be subject to the forthcoming National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters (40 CFR Part 63, Subpart DDDDD).

WB3 is currently operated at an annual capacity factor of 13.8% or less. Per Chapter 117, boilers that are required by a federally enforceable license condition to remain at a capacity factor of less than 30% are not required to install Continuous Opacity Monitors (COMS) or NO_x Continuous Emission Monitors (CEMS). Emissions from WB1, WB2, WB3, and WB4 exit through a combined 348-ft stack (power boiler stack).

The Mill operates boilers WB1, WB2, WB3, and WB4 below 50% of the boiler load capacity that the combined power boiler stack was designed for (based on a 12-month rolling total). Therefore, The Mill is subject to a less stringent opacity standard per MEDEP Chapter 101, Section 2(B)(5)(iii). Should The Mill request an increase in the facility wide fuel limit, a more stringent opacity limit would be required.

Streamlining

1. Opacity
MEDEP Chapter 101, Section 2(B)(5) and Section 3 contain the only applicable opacity standard for the combined emissions from the power boiler stack.

No streamlining requested.

2. PM
 - a. MEDEP Chapter 103, Section 2(A)(1) contains the only applicable PM lb/MMBtu emission standard.
 - b. 40 CFR Part 63, Subpart DDDDD has not been promulgated as of the date of this license. However, the final rule may contain PM lb/MMBtu emission standards which are applicable to this equipment.

Currently, no streamlining is requested. However, The Mill may request streamlining for PM lb/MMBtu to MEDEP Chapter 103 or 40 CFR Part 63, Subpart DDDDD, whichever is the more stringent standard, once the emission limits of Subpart DDDDD come into effect.

- c. BPT establishes the only applicable PM lb/hr emissions limit.
No streamlining requested.

3. PM₁₀

BPT establishes the only applicable PM₁₀ lb/MMBtu and lb/hr emission limits.
No streamlining requested.

4. SO₂
 - a. MEDEP Chapter 106, Section 2(A)(2) contains the only applicable fossil fuel sulfur content standard. **No streamlining requested.**
 - b. BPT establishes the only applicable SO₂ lb/MMBtu and lb/hr emission limits. **No streamlining requested.**

5. NO_x
 - a. WB3 is restricted to the operational requirements of an auxiliary/standby boiler as set forth in MEDEP Chapter 138, Section (3)(M). Therefore, the lb/MMBtu standard in MEDEP Chapter 138 does not apply to this boiler.
 - b. BPT establishes the only applicable NO_x lb/MMBtu and lb/hr emission limits. **No streamlining requested.**

6. CO

BPT establishes the only applicable CO lb/MMBtu and lb/hr emission limits.
No streamlining requested.

7. VOC

BPT establishes the only applicable VOC lb/MMBtu and lb/hr emission limits. **No streamlining requested.**

Periodic Monitoring

Periodic monitoring shall consist of record keeping which demonstrates fuel use and delivery receipts or other records from the supplier indicating the percent sulfur by weight of the fuel oil.

The Mill shall stack test WB3 for PM in accordance with 40 CFR Part 60, Appendix A, Method 5 upon request by the Department.

Based on best management practices and the type of fuel for which WB3 is designed, it is unlikely that this boiler will exceed the emission limits for CO and VOC. Therefore, periodic monitoring by the source for these pollutants is not required. However, neither the EPA nor the State is precluded from requesting the Mill to perform testing and may take enforcement action for any violations discovered.

Parameter Monitors

There are no Parameter Monitors required for WB3.

CEMS and COMS

There are no CEMS or COMS required to be operated for WB3.

Control Equipment

Control equipment for WB3 consists of the low NO_x burners.

C. Power Boiler #4 (WB4)

WB4 was manufactured by Riley - Stoker with a maximum design heat input of 740 MMBtu/hr. This boiler is licensed to fire #6 fuel oil and #2 fuel oil. The sulfur content of the fuel oil fired shall not exceed a maximum fuel sulfur content of 2.0% by weight.

This boiler was installed in 1970, prior to the New Source Performance Standards (NSPS) Subparts D, Da, and Db applicability dates.

WB4 is located at a major source of Hazardous Air Pollutants (HAPs) and will therefore be subject to the forthcoming National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters (40 CFR Part 63, Subpart DDDDD).

WB4 is each equipped with low NO_x burners and a Foxboro IA Digital Control System.

WB4 operates a CEMS for NO_x on the boiler exhaust. Emissions from WB1, WB2, WB3, and WB4 exit through a combined 348-ft stack (power boiler stack).

A COM is operated on the combined power boiler stack. WB4 is also each equipped with an individual COM.

The combined power boiler stack is large and when only one boiler is exhausted into the stack, the gases sometimes cool to the point of condensing. The condensation causes the combined power boiler stack COM to record values that are not necessarily representative of the exhaust opacity. Particulate matter stack test results have shown that the facility is within its limits, even with higher opacity stack meter readings. Therefore, when only one boiler (WB1, WB2 or WB4) is operating the individual boiler COM may be used to demonstrate compliance. The opacity at the individual boiler COM shall be corrected to the corresponding opacity at the exit of the combined power boiler stack.

The Mill operates boilers WB1, WB2, WB3, and WB4 below 50% of the boiler load capacity that the combined power boiler stack was designed for (based on a 12-month rolling total). Therefore, The Mill is subject to a less stringent opacity standard per MEDEP Chapter 101, Section 2(B)(5)(iii). Should The Mill request an increase in the facility wide fuel limit, a more stringent opacity limit would be required.

Streamlining

1. Opacity

MEDEP Chapter 101, Section 2(B)(5) and Section 3 contain the only applicable opacity standard for the combined emissions from the power boiler stack. **No streamlining requested.**

2. PM

- a. MEDEP Chapter 103, Section 2(A)(1) contains the only applicable PM lb/MMBtu emission standard.
- b. 40 CFR Part 63, Subpart DDDDD has not been promulgated as of the date of this license. However, the final rule may contain PM lb/MMBtu emission standards which are applicable to this equipment.

Currently, no streamlining is requested. However, The Mill may request streamlining for PM lb/MMBtu to MEDEP Chapter 103 or 40 CFR Part 63, Subpart DDDDD, whichever is the more stringent standard, once the emission limits of Subpart DDDDD come into effect.

- c. BPT establishes the only applicable PM lb/hr emissions limit. **No streamlining requested.**

3. PM₁₀
BPT establishes the only applicable PM₁₀ lb/MMBtu and lb/hr emission limits. **No streamlining requested.**
4. SO₂
 - a. MEDEP Chapter 106, Section 2(A)(2) contains the only applicable fossil fuel sulfur content standard. **No streamlining requested.**
 - b. BPT establishes the only applicable SO₂ lb/MMBtu and lb/hr emission limits. **No streamlining requested.**
5. NO_x
 - a. WB4 is equipped with low NO_x Burners for control of NO_x emissions. The low NO_x Burners meet the requirement in MEDEP Chapter 138 Section 3(B)(1) to operate a low NO_x burner or equivalent strategy. Therefore, the lb/MMBtu standard in MEDEP Chapter 138 does not apply to this boiler.
 - b. BPT establishes the only applicable NO_x lb/MMBtu and lb/hr emission limits. **No streamlining requested.**
6. CO
BPT establishes the only applicable CO lb/MMBtu and lb/hr emission limits. **No streamlining requested.**
7. VOC
BPT establishes the only applicable VOC lb/MMBtu and lb/hr emission limits. **No streamlining requested.**

Periodic Monitoring

Periodic monitoring shall consist of record keeping which demonstrates fuel use and delivery receipts or other records from the supplier indicating the percent sulfur by weight of the fuel oil.

The Mill shall stack test WB4 for PM in accordance with 40 CFR Part 60, Appendix A, Method 5 upon request by the Department.

Based on best management practices and the type of fuel for which WB4 was designed, it is unlikely that this boiler will exceed the emission limits for CO and VOC. Therefore, periodic monitoring by the source for these pollutants is not required. However, neither the EPA nor the State is precluded from requesting the Mill to perform testing and may take enforcement action for any violations discovered.

Parameter Monitors

There are no Parameter Monitors required for WB4.

CEMS and COMS

1. MEDEP Chapter 117 contains an applicable requirement to monitor opacity and NO_x emissions.
2. MEDEP Chapter 138 contains an applicable requirement to monitor NO_x lb/MMBtu emissions.

Based on the above, The Mill shall operate a CEMS which provides data to calculate NO_x lb/MMBtu and % CO₂ from WB4.

When more than one boiler is operating, opacity from the power boiler stack shall be monitored by a COMS except during startup as allowed by Condition (18). Monitoring of the power boiler stack opacity meets the requirements of MEDEP Chapter 117 to monitor opacity from WB1 and WB2.

When only one boiler is operating, the individual boiler COM may be operated and the output corrected to the corresponding opacity at the exit of the power boiler stack.

Control Equipment

Control equipment for WB4 consists of the low NO_x burners.

D. Lift Station Back-up Pump

The Lift Station Back-up Pump was installed in 1992, and has a design capacity of 6.8 MMBtu/hr (960 HP).

In order to be exempt from NO_x RACT requirements, The Mill accepted a license restriction of 850 hr/yr (12-month rolling total) for the Lift Station Back-up Pump to maintain NO_x emissions below 10 tons per year.

Streamlining

1. Opacity
MEDEP Chapter 101, Section 2(B)(1)(f) contains the only applicable opacity standard for the emissions from the lift station. **No streamlining requested.**
2. PM
 - a. MEDEP Chapter 103, Section 2(B)(1)(a) contains the only applicable PM lb/MMBtu emission standard. **No streamlining requested.**
 - b. BPT establishes the only applicable PM lb/hr emissions limit. **No streamlining requested.**

3. PM₁₀
BPT establishes the only applicable PM₁₀ lb/hr emission limit.
No streamlining requested.

4. SO₂
a. MEDEP Chapter 106, Section 2(A)(2) contains an applicable fossil fuel sulfur content standard.
b. BPT also establishes an applicable fossil fuel sulfur content limit.

The Mill accepts streamlining for the fossil fuel sulfur content limits. The BPT limits are more stringent and therefore only the BPT fossil fuel sulfur content limits are included in this license.

- c. BPT establishes the only applicable SO₂ lb/hr emission limit.
No streamlining requested.

5. NO_x
BPT establishes the only applicable NO_x lb/hr emission limit.
No streamlining requested.

6. CO
BPT establishes the only applicable CO lb/hr emission limit.
No streamlining requested.

7. VOC
BPT establishes the only applicable VOC lb/hr emission limit.
No streamlining requested.

Periodic Monitoring

Periodic monitoring shall consist of recordkeeping which includes hours of operation and fuel delivery receipts showing % sulfur.

Based on best management practices and the type of fuel for which the pump was designed, it is unlikely that the Lift Station Back-up Pump will exceed the opacity limits. Therefore, periodic monitoring by the source for opacity in the form of visible emission testing is not required. However, neither the EPA nor the State is precluded from performing its own testing and may take enforcement action for any violations discovered.

E. LPG Dryer System

The LPG Dryer System was installed on the off-machine coater in 1990, and has a capacity of 27.3 MMBtu/hr firing propane.

Streamlining

1. PM
 - a. MEDEP Chapter 103, Section 2(B)(1)(a) contains the only applicable PM lb/MMBtu emission standard. **No streamlining requested.**
 - b. BPT establishes the only applicable PM lb/hr emissions limit. **No streamlining requested.**
2. PM₁₀

BPT establishes the only applicable PM₁₀ lb/hr emission limit. **No streamlining requested.**
3. NO_x

BPT establishes the only applicable NO_x lb/hr emission limit. **No streamlining requested.**
4. CO

BPT establishes the only applicable CO lb/hr emission limit. **No streamlining requested.**
5. VOC

BPT establishes the only applicable VOC lb/hr emission limit. **No streamlining requested.**

Periodic Monitoring

Periodic monitoring shall consist of record keeping which demonstrates fuel use.

F. PCC Plant

In 2001 a precipitated calcium carbonate manufacturing facility was installed at the Millinocket mill. The PCC is used by The Mill as a filler and coating for paper produced at the Millinocket and East Millinocket facilities and for sale at other facilities.

The principal raw materials used in the PCC process are lime (CaO) and carbon dioxide (CO₂). Lime arrives by truck or railcar and is unloaded into storage silos. A calcium hydroxide (Ca(OH)₂) slurry is formed by slaking the lime with water. The boiler flue gases are put through a gas cooler, then bubbled through the

Ca(OH)₂ slurry in carbonators. The carbon dioxide in the flue gas is absorbed in this carbonation process. The end product is precipitated calcium carbonate. The PCC is stored in slurry form until used in the paper mill or shipped off-site.

Emissions from the PCC plant include the existing emissions from the boiler flue gases, less that absorbed in the process, and potential additional particulate emissions from the lime unloading system, the lime storage silo, and the carbonators.

1. Lime Unloading System and Lime Storage Silo

The lime unloading system pneumatically conveys the lime from trucks or railcars to the lime storage silo. The particulate matter from the pneumatic conveying system is controlled by a baghouse on the lime storage silo.

BPT for the lime unloading system and storage silo was determined to be the following:

- a. Use of the baghouse on the lime silo.
- b. Fugitive emissions from the lime unloading system shall not exceed 5% opacity on a six (6) minute block average basis.
- c. Emissions from the lime silo baghouse shall not exceed 5% opacity on a six (6) minute block average basis.

2. Carbonators

The emissions from the carbonators are due to the boiler gases passing through the lime slurry. CO₂ is reduced since it is utilized to produce PCC. SO₂ emissions are reduced by up to 85% due to the reaction of the sulfur substances with the lime in the carbonators. PM emissions are reduced by the use of mist eliminators. The other pollutants in the boilers' flue gas stream (NO_x, CO, VOC) pass through directly and are unaffected by the PCC process.

BPT for the carbonators was determined to be the following:

- a. Use of mist eliminators for control of particulate matter.
- b. Visible emissions from the carbonator stacks shall each not exceed 10% opacity on a six (6) minute block average basis.

Streamlining

PM

- a. MEDEP Chapter 105 contains an applicable PM lb/hr emission standard.

- b. BPT establishes an applicable PM lb/hr emissions limit.

The Mill accepts streamlining for the PM lb/hr emission limit. The BPT limits are more stringent and therefore only the BPT PM lb/hr emission limit is included in this license.

G. Sulfite Mill

The Mill has a previously permitted sulfite pulp mill on site. The sulfite mill is currently not operational and therefore not included in this permit. Should The Mill decide to re-activate the sulfite mill, a permit amendment will be required. However, since this operation was previously permitted, re-activation would not trigger New Source Review (NSR).

H. VOC RACT

The following processes were addressed by VOC RACT:

1. Paper Process

The paper processes include the paper machines and coating/finishing operations. These are exempt from VOC RACT per MEDEP Chapter 134.

2. Wastewater Treatment System

The wastewater treatment system is subject to VOC RACT. Per MEDEP Chapter 134 The Mill is meeting VOC RACT for wastewater treatment air emissions through the operation of a wastewater treatment system as required by effluent discharge license restrictions issued pursuant to the facility's National Pollution Discharge Elimination System (NPDES) discharge permit.

3. Pulp Process

The pulp process includes the Refiner Mechanical Pulp (RMP) grinder room, screening, and washing. These processes are subject to VOC RACT.

The woodyard is exempt per MEDEP Chapter 134.

The RMP steam exhaust includes a direct equipment exhaust venting into two duct headers which then exit to the atmosphere via a single stack for each heater above the RMP building. Process conditions include intense mechanical pressure that results in high temperature and pressure. This causes rapid evaporation of moisture from the wood as well as volatilization of certain VOC species. The steam displaced via the vent header system acts as a medium for VOC release to atmosphere.

A condensation system consisting of a heat recovery unit is installed on the RMP steam exhaust. The heat recovery system reduces the temperature of the exhaust sufficiently to reduce VOC concentrations.

The Mill shall maintain a 90% uptime on the condensation system on the RMP steam exhaust. The Mill shall operate a Parameter Monitor to continuously monitor and record temperature of the RMP steam exhaust.

4. Combustion Sources

VOC emissions from combustion sources, including WB1, WB2, WB3, and WB4, are associated with products of incomplete combustion and are exempt from VOC RACT per MEDEP Chapter 134.

I. NO_x RACT

The following licensed emission units are subject to NO_x RACT:

1. WB1 and WB2

In order to meet NO_x RACT requirements, these boilers have been retrofitted with low NO_x burners. The boilers are also connected to a new Foxboro IA Digital Control System (DCS). The new burners and the DCS should significantly reduce the actual NO_x emissions from the two boilers. Compliance is demonstrated through the use of a CEM that satisfies the requirements of MEDEP Chapter 117.

2. WB3

The Mill proposed an alternative NO_x RACT for WB3. The boiler is used as an auxiliary/standby boiler with NO_x emissions under 100 tons/year on a 12 month rolling average and NO_x emissions under 20 tons per any calendar month. The boiler will go through an annual tune-up and the records of the tune-up will be kept per MEDEP Chapter 138, Section 3(L)(2).

The 100 tons/year NO_x limit will limit the usage of the boiler to approximately 13.8% of its annual capacity factor. A NO_x CEM is not required for this boiler since the unit will be licensed at 100 tons/year and this annual usage will be below a 30% annual capacity factor. MEDEP Chapter 117 states that a NO_x CEM is not required if it is demonstrated that the annual average capacity factor is less than 30% and is projected to remain at less than 30% as required by a license condition.

Compliance will be demonstrated by maintaining WB3 oil usage figures on a 12 month rolling total basis showing that less than 2,950,000 gallons was fired in the boiler annually and less than 590,000 gallons was fired in any one month. Any excess monthly or annual oil usage events will be reported to the

Bureau of Air Quality Control in the same manner as excess emissions are reported.

3. WB4

In order to meet NO_x RACT requirements, this boiler's burners have been modified to meet the definition of low NO_x burners. The modification of the burners and the installation of the new DCS will reduce the actual NO_x emissions from the boiler. Compliance will be demonstrated through the use of a CEM that satisfies the requirements of MEDEP Chapter 117.

4. LPG Dryer Sytem

The LPG Dryer Sytem, which heats emitter plates for infrared drying of the coated paper, fires propane. Due to the design and operational nature of the dryers, typical NO_x controls such as low NO_x burners, FGR, over-fire air, SNCR and SCR are not technically feasible. These additional controls require combustion gases to be contained, but infrared drying requires open flame combustion to heat the metal emitter plates. Burners out of service and alternate operating scenarios would result in loss of production and are not viable options. Since propane is inherently a low pollutant emitting fuel, there are no alternative fuels that could be used to lower NO_x. Based on the above, NO_x RACT for the LPG Dryer System was determined to be the continued use of propane.

5. Emergency Back up Units

The lift station back-up pump is used only when fired off on a set schedule to ensure it is operating properly and occasionally for emergencies. Maintaining this engine in top operating condition and limiting the operating hours to 850 hours/year will restrict emissions to less than 10 tons/year. The Mill shall use an hour meter and maintain monthly records of hours of operation.

J. Facility Emissions

Total Allowable Annual Emissions for the Facility
(used to calculate the license fee)

	PM	PM ₁₀	SO ₂	NO _x	CO	VOC
Boilers	678.8	678.8	7131.4	1527.2	101.8	33.9
Pump	0.4	0.4	0.2	9.3	2.5	0.3
Dryers	0.4	0.4	0.1	16.3	4.1	0.3
Total TPY	679.6	679.6	7131.7	1552.8	108.4	34.5

III. AIR QUALITY ANALYSIS

The Mill previously submitted an ambient air quality analysis demonstrating that emissions from the facility, in conjunction with all other sources, do not violate ambient air quality standards. An additional ambient air quality analysis is not required for this Initial Part 70 License.

ORDER

Based on the above Findings and subject to conditions listed below, the Department concludes that emissions from this sources:

- will receive Best Practical Treatment;
- will not violate applicable emissions standards
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

The Department hereby grants the Part 70 License A-406-70-A-I pursuant to MEDEP Chapter 140 and the preconstruction permitting requirements of MEDEP Chapter 115 and subject to the standard and special conditions below.

All federally enforceable and State-only enforceable conditions in existing air licenses previously issued to The Mill pursuant to the Department's preconstruction permitting requirements in Chapters 108 or 115 have been incorporated into this Part 70 license, except for such conditions that MEDEP has determined are obsolete, extraneous or otherwise environmentally insignificant, as explained in the findings of fact accompanying this permit. As such the conditions in this license supercede all previously issued air license conditions.

Federally enforceable conditions in this Part 70 license must be changed pursuant to the applicable requirements in Chapter 115 for making such changes and pursuant to the applicable requirements in Chapter 140.

For each standard and special condition which is state enforceable only, state-only enforceability is designated with the following statement: **Enforceable by State-only.**

STANDARD STATEMENTS

- (1) Approval to construct shall become invalid if the source has not commenced construction within eighteen (18) months after receipt of such approval or if construction is discontinued for a period of eighteen (18) months or more. The Department may extend this time period upon a satisfactory showing that an extension is justified, but may condition such extension upon a review of either

- the control technology analysis or the ambient air quality standards analysis, or both;
- (2) The Part 70 license does not convey any property rights of any sort, or any exclusive privilege;
 - (3) All terms and conditions are enforceable by EPA and citizens under the CAA unless specifically designated as state enforceable.
 - (4) The licensee may not use as a defense in an enforcement action that the disruption, cessation, or reduction of licensed operations would have been necessary in order to maintain compliance with the conditions of the air emission license;
 - (5) Notwithstanding any other provision in the State Implementation Plan approved by the EPA or Section 114(a) of the CAA, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any statute, regulation, or Part 70 license requirement.
 - (6) Compliance with the conditions of this Part 70 license shall be deemed compliance with any Applicable requirement as of the date of license issuance and is deemed a permit shield, provided that:
 - (a) Such Applicable and state requirements are included and are specifically identified in the Part 70 license, except where the Part 70 license term or condition is specifically identified as not having a permit shield; or
 - (b) The Department, in acting on the Part 70 license application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the Part 70 license includes the determination or a concise summary, thereof.

Nothing in this section or any Part 70 license shall alter or effect the provisions of Section 303 of the CAA (emergency orders), including the authority of EPA under Section 303; the liability of an owner or operator of a source for any violation of Applicable requirements prior to or at the time of permit issuance; or the ability of EPA to obtain information from a source pursuant to Section 114 of the CAA.

The following requirements have been specifically identified as not applicable based upon information submitted by the licensee in an application dated October 2, 1997.

	SOURCE	CITATION	DESCRIPTION	BASIS FOR DETERMINATION
A	Facility	MEDEP Chapter 104	Incinerator Particulate Standard	No applicable sources at this facility
B	Facility	MEDEP Chapter 111	Petroleum Liquid Vapor Storage Control	Fuel oil stored at the facility has a vapor pressure below threshold limits.
C	WB1, WB2, WB3, WB4	40 CFR Part 60, Subpart Da	NSPS for Electric Utility Units	These boilers are not electric utility units.
D	WB1, WB2, WB3, WB4	40 CFR Part 60, Subpart Dc	NSPS for Steam Generating Units less than 100 MMBtu/hr	These units are larger than 100 MMBtu/hr.

(7) The Part 70 license shall be reopened for cause by the Department or EPA, prior to the expiration of the Part 70 license, if:

- (a) Additional Applicable requirements under the CAA become applicable to a Part 70 major source with a remaining Part 70 license term of 3 or more years. However, no opening is required if the effective date of the requirement is later than the date on which the Part 70 license is due to expire, unless the original Part 70 license or any of its terms and conditions has been extended pursuant to Chapter 140;
- (b) Additional requirements (including excess emissions requirements) become applicable to a Title IV source under the acid rain program. Upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the Part 70 license;
- (c) The Department or EPA determines that the Part 70 license contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the Part 70 license; or
- (d) The Department or EPA determines that the Part 70 license must be revised or revoked to assure compliance with the Applicable requirements.

The licensee shall furnish to the Department within a reasonable time any information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the Part 70 license or to determine compliance with the Part 70 license.

- (8) No license revision or amendment shall be required, under any approved economic incentives, marketable licenses, emissions trading and other similar programs or processes for changes that are provided for in the Part 70 license.

STANDARD CONDITIONS

- (1) Employees and authorized representatives of the Department shall be allowed access to the licensee's premises during business hours, or any time during which any emissions units are in operation, and at such other times as the Department deems necessary for the purpose of performing tests, collecting samples, conducting inspections, or examining and copying records relating to emissions and this license (Title 38 MRSA §347-C);
- (2) The licensee shall acquire a new or amended air emission license prior to commencing construction of a modification, unless specifically provided for in Chapter 140;
- (3) The licensee shall establish and maintain a continuing program of best management practices for suppression of fugitive particulate matter during any period of construction, reconstruction, or operation which may result in fugitive dust, and shall submit a description of the program to the Department upon request; **Enforceable by State-only**
- (4) The licensee shall pay the annual air emission license fee to the Department, calculated pursuant to Title 38 MRSA §353.
- (5) The licensee shall maintain and operate all emission units and air pollution control systems required by the air emission license in a manner consistent with good air pollution control practice for minimizing emissions; **Enforceable by State-only**
- (6) The licensee shall retain records of all required monitoring data and support information for a period of at least six (6) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the Part 70 license. The records shall be submitted to the Department upon written request or in accordance with other provisions of this license;
- (7) The licensee shall comply with all terms and conditions of the air emission license. The submission of notice of intent to reopen for cause by the Department, the filing of an appeal by the licensee, the notification of planned changes or anticipated noncompliance by the licensee, or the filing of an application by the licensee for the renewal of a Part 70 license or amendment shall not stay any condition of the Part 70 license.

- (8) In accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department, the licensee shall:
- A. perform stack testing under circumstances representative of the facility's normal process and operating conditions:
 - 1. within sixty (60) calendar days of receipt of a notification to test from the Department or EPA, if visible emissions, equipment operating parameters, staff inspection, air monitoring or other cause indicate to the Department that equipment may be operating out of compliance with emission standards or license conditions;
 - 2. to demonstrate compliance with the applicable emission standards; or
 - 3. pursuant to any other requirement of this license to perform stack testing.
 - B. install or make provisions to install test ports that meet the criteria of 40 CFR Part 60, Appendix A, and test platforms, if necessary, and other accommodations necessary to allow emission testing; and
 - C. submit a written report to the Department within thirty (30) days from date of test completion.

Enforceable by State-only

- (9) If the results of a stack test performed under circumstances representative of the facility's normal process and operating conditions indicates emissions in excess of the applicable standards, then:
- A. within thirty (30) days following receipt of such test results, the licensee shall re-test the non-complying emission source under circumstances representative of the facility's normal process and operating conditions and in accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department; and
 - B. the days of violation shall be presumed to include the date of stack test and each and every day of operation thereafter until compliance is demonstrated under normal and representative process and operating conditions, except to the extent that the facility can prove to the satisfaction of the Department that there were intervening days during which no violation occurred or that the violation was not continuing in nature; and

- C. the licensee may, upon the approval of the Department following the successful demonstration of compliance at alternative load conditions, operate under such alternative load conditions on an interim basis prior to a demonstration of compliance under normal and representative process and operating conditions.

Enforceable by State-only

- (10) The licensee shall maintain records of all deviations from license requirements. Such deviations shall include, but are not limited to malfunctions, failures, downtime, and any other similar change in operation of air pollution control systems or the emission unit itself that is not consistent with the terms and conditions of the air emission license.

- A. The licensee shall notify the Commissioner within 48 hours of a violation in emission standards and/or a malfunction or breakdown in any component part that causes a violation of any emission standard, and shall report the probable cause, corrective action, and any excess emissions in the units of the applicable emission limitation;

- B. The licensee shall submit a report to the Department on a quarterly basis if a malfunction or breakdown in any component part causes a violation of any emission standard, together with any exemption requests.

Pursuant to 38 MRSA § 349(9), the Commissioner may exempt from civil penalty an air emission in excess of license limitations if the emission occurs during start-up or shutdown or results exclusively from an unavoidable malfunction entirely beyond the control of the licensee and the licensee has taken all reasonable steps to minimize or prevent any emission and takes corrective action as soon as possible. There may be no exemption if the malfunction is caused, entirely or in part, by poor maintenance, careless operation, poor design or any other reasonably preventable condition or preventable equipment breakdown. The burden of proof is on the licensee seeking the exemption under this subsection.

- C. All other deviations shall be reported to the Department in the facility's semiannual report.

- (11) Upon the written request of the Department, the licensee shall establish and maintain such records, make such reports, install, use, and maintain such monitoring equipment, sample such emissions (in accordance with such methods, at such locations, at such intervals, and in such manner as the Department shall prescribe), and provide other information as the Department may reasonably require to determine the licensee's compliance status.

- (12) The licensee shall submit semiannual reports of any required periodic monitoring. All instances of deviations from Part 70 license requirements must be clearly identified in such reports. All required reports must be certified by a responsible official.
- (13) The licensee shall submit a compliance certification to the Department and EPA at least annually, or more frequently if specified in the applicable requirement or by the Department. The compliance certification shall include the following:
 - (a) The identification of each term or condition of the Part 70 license that is the basis of the certification;
 - (b) The compliance status;
 - (c) Whether compliance was continuous or intermittent;
 - (d) The method(s) used for determining the compliance status of the source, currently and over the reporting period; and
 - (e) Such other facts as the Department may require to determine the compliance status of the source;

SPECIAL CONDITIONS

(14) WB1 and WB2

- A. WB1 and WB2 are licensed to fire #6 fuel oil, #2 fuel oil, and specification waste oil. [MEDEP Chapter 140, BPT]
- B. The sulfur content of the fuel oil fired, including the waste oil, shall not exceed 2.0% by weight. Compliance with the sulfur content limit for the fuel oil shall be demonstrated by receipts or other records from the supplier indicating the percent sulfur by weight of the fuel oil. Compliance with the sulfur content limit for the waste oil fired shall be demonstrated by an initial test of the percent sulfur by weight of the waste oil and additional testing upon request by the Department. [MEDEP Chapter 106]

C. Emissions from WB1 and WB2 shall each not exceed the following limits:

Pollutant	lb/MMBtu	Origin and Authority	Enforceability
PM	0.20	MEDEP, Chapter 103, Section 2(A)(1)	Federally Enforceable
NO _x	0.45	MEDEP Chapter 140, BPT	Enforceable by State-only

Pollutant	lb/hr	Origin and Authority	Enforceability
PM	74.0	MEDEP Chapter 140, BPT	Enforceable by State-only
PM ₁₀	74.0	MEDEP Chapter 140, BPT	Enforceable by State-only
SO ₂	777.5	MEDEP Chapter 140, BPT	Enforceable by State-only
NO _x	166.5	MEDEP Chapter 140, BPT	Enforceable by State-only
CO	11.1	MEDEP Chapter 140, BPT	Enforceable by State-only
VOC	3.7	MEDEP Chapter 140, BPT	Enforceable by State-only

D. Compliance with the PM lb/MMBtu and lb/hr limits shall be demonstrated by stack testing in accordance with 40 CFR Part 60, Appendix A, Method 5. [MEDEP Chapter 140, BPT]

E. Compliance stack testing for PM shall be performed once by December 31, 2004 and once every two years thereafter. The Mill may request, and the Department may consider, deferral of this requirement until such time as WB2 is fully operational. [MEDEP Chapter 140, BPT]

F. Compliance with the NO_x lb/MMBtu emission limit shall be on a 24-hr block average basis demonstrated by means of a CEMS. Periods of startup, shutdown, and equipment malfunctions shall not be included in determining the 24-hour block averages. [MEDEP Chapter 138 and 140]
Enforceable by State-only

G. Compliance with the NO_x lb/hr emission limit shall be demonstrated by stack testing upon request by the Department in accordance with 40 CFR Part 60, Appendix A, Method 7E. [MEDEP Chapter 140, BPT]

H. While operating WB1 and WB2, The Mill shall operate the low NO_x burners for control of NO_x emissions. [MEDEP Chapter 138 and 140]

(15) **WB3**

A. WB3 is licensed to fire #6 fuel oil, #2 fuel oil, and specification waste oil. [MEDEP Chapter 140, BPT]

B. The sulfur content of the fuel oil fired, including the waste oil, shall not exceed 2.0% by weight. Compliance with the sulfur content limit for the fuel oil shall be demonstrated by receipts or other records from the supplier indicating the percent sulfur by weight of the fuel oil. Compliance with the sulfur content limit for the waste oil fired shall be demonstrated by an initial test of the percent sulfur by weight of the waste oil and additional testing upon request by the Department. [MEDEP Chapter 106]

C. Emissions from WB3 shall not exceed the following limits:

Pollutant	lb/MMBtu	Origin and Authority	Enforceability
PM	0.20	MEDEP, Chapter 103, Section 2(A)(1)	Federally Enforceable
NO _x	0.45	MEDEP Chapter 140, BPT	Enforceable by State-only

Pollutant	lb/hr	Origin and Authority	Enforceability
PM	74.0	MEDEP Chapter 140, BPT	Enforceable by State-only
PM ₁₀	74.0	MEDEP Chapter 140, BPT	Enforceable by State-only
SO ₂	777.5	MEDEP Chapter 140, BPT	Enforceable by State-only
NO _x	166.5	MEDEP Chapter 140, BPT	Enforceable by State-only
CO	11.1	MEDEP Chapter 140, BPT	Enforceable by State-only
VOC	3.7	MEDEP Chapter 140, BPT	Enforceable by State-only

Pollutant	TPY	Origin and Authority	Enforceability
NO _x	100.0	MEDEP Chapter 138	Federally Enforceable

D. Compliance with the PM lb/MMBtu and lb/hr limits shall be demonstrated by stack testing in accordance with 40 CFR Part 60, Appendix A, Method 5 upon request by the Department. [MEDEP Chapter 140, BPT]

E. WB3 shall not exceed a fuel usage of 590,000 gallons per month and 2,950,000 gallons per year based on a 12 month rolling total. [MEDEP Chapter 140, BPT]

F. The Mill shall maintain documentation of the annual capacity factor for WB3 for each calendar year. [MEDEP Chapter 138]

G. Compliance with the NO_x lb/MMBtu and lb/hr emission limits shall be demonstrated by stack testing upon request by the Department in accordance with 40 CFR Part 60, Appendix A, Method 7E. [MEDEP Chapter 140, BPT]

(16) **WB4**

- A. WB4 is licensed to fire #6 fuel oil and #2 fuel oil. [MEDEP Chapter 140, BPT]
- B. The sulfur content of the fuel oil fired shall not exceed 2.0% by weight demonstrated by receipts or other records from the supplier indicating the percent sulfur by weight of the fuel oil. [MEDEP Chapter 106]
- C. Emissions from WB4 shall not exceed the following limits:

Pollutant	lb/MMBtu	Origin and Authority	Enforceability
PM	0.20	MEDEP, Chapter 103, Section 2(A)(1)	Federally Enforceable
NO _x	0.45	MEDEP Chapter 140, BPT	Enforceable by State-only

Pollutant	lb/hr	Origin and Authority	Enforceability
PM	148.0	MEDEP Chapter 140, BPT	Enforceable by State-only
PM ₁₀	148.0	MEDEP Chapter 140, BPT	Enforceable by State-only
SO ₂	1,555.0	MEDEP Chapter 140, BPT	Enforceable by State-only
NO _x	333.0	MEDEP Chapter 140, BPT	Enforceable by State-only
CO	22.2	MEDEP Chapter 140, BPT	Enforceable by State-only
VOC	7.4	MEDEP Chapter 140, BPT	Enforceable by State-only

- D. Compliance with the PM lb/MMBtu and lb/hr limits shall be demonstrated by stack testing in accordance with 40 CFR Part 60, Appendix A, Method 5 upon request by the Department. [MEDEP Chapter 140, BPT]
- E. Compliance with the NO_x lb/MMBtu emission limit shall be on a 24-hr block average basis demonstrated by means of a CEMS. Periods of startup, shutdown, and equipment malfunctions shall not be included in determining the 24-hour block averages. [MEDEP Chapter 138 and 140]
Enforceable by State-only
- F. Compliance with the NO_x lb/hr emission limit shall be demonstrated by stack testing upon request by the Department in accordance with 40 CFR Part 60, Appendix A, Method 7E. [MEDEP Chapter 140, BPT]
- G. While operating WB4, The Mill shall operate the low NO_x burners for control of NO_x emissions. [MEDEP Chapter 138 and 140]

(17) Fuel Limit

- A. The Mill shall not exceed a combined fuel limit for WB1, WB2, WB3 and WB4 of 45,250,000 gallons per year based on a 12 month rolling total. [MEDEP Chapter 140, BPT]
- B. The Mill is licensed to fire specification waste oil, including specification waste oil from the hydroelectric generating stations, in the power boilers. Records shall be maintained documenting the amount of specification waste oil fired each month. [MEDEP Chapter 140, BPT]

(18) Opacity

A. Multiple Boilers On-line

- 1. For the combined power boiler stack with multiple boilers on-line and the sources operating below 50% of the boiler load capacity at which the common stack was designed for, based on a 12 month rolling total, visible emissions from the common stack shall not exceed:
 - i. 30% opacity on a six (6) minute block average basis for 95 percent of all six (6) minute block averages on a quarterly basis.
 - ii. In addition, the common stack opacity shall not exceed 40% opacity on a six (6) minute block average basis for 99 percent of all six (6) minute block averages on a quarterly basis.

Periods of start-up, shutdown and malfunctions are included for the purpose of calculating block averages under this condition. [MEDEP Chapter 101]

- 2. The Mill shall operate and maintain a continuous opacity monitor on the combined stack. The monitor shall meet the requirements of Chapter 117 of the Department's regulations. [MEDEP Chapter 117]
- 3. The Mill shall keep records documenting when more than one boiler is operating and the opacity when multiple boilers are on-line. [MEDEP Chapter 117]
- 4. During startup of multiple boilers, The Mill may use the individual boiler opacity monitors on the individual boilers' breeching instead of the common stack opacity monitor. The individual boiler opacity monitors may be used no more than four hours from the start-up of two or more boilers exhausting into the common stack (ie – For a single boiler at start-

up, the individual boiler opacity monitor can be used. If a second boiler is started up, both boilers may use the individual opacity monitors only for four hours, then the common stack monitor shall be used). The opacity at the individual boiler monitor shall be corrected to the corresponding opacity at the exit of the 106 meter stack.

If more than one boiler is being operated during startup and the individual opacity monitors on the boilers' breeching are being used; then the highest opacity for each 6-minute block average recorded on any of the boilers shall be used in calculating the percentages in 1.

(Note: If the boilers are below 30% opacity, then this would be used to meet the 95% requirement. If one boiler exceeded 30% opacity but was less than 40% opacity, the time would be put in the 99% category. If any boiler exceeded the 40% opacity, the time would be put in the 1% category. The uptime shall be calculated as the block of time when more than one boiler is operating, not the sum of the individual boilers' operating time.)

[MEDEP Chapter 101]

B. Only One Boiler On-line

1. If only one boiler is operating (1, 2, 3, or 4), the opacity shall not exceed 30% opacity based on a six (6) minute block average basis, except for no more than 2 six minute block averages in a three hour block period. [MEDEP Chapter 101]
2. If only one boiler is operating, the individual boiler opacity monitor may be used to demonstrate compliance. The opacity at the individual boiler monitor shall be corrected to the corresponding opacity at the exit of the combined power boiler stack. [MEDEP Chapter 101]

C. Individual Opacity Monitors

1. When in use, the individual monitor(s) shall be maintained and operated in accordance with Chapter 117 of the Department's regulations. [MEDEP Chapter 117]
2. The Mill shall include a statement in the quarterly report noting which, if any, individual monitors were used, the date and duration they were used, and any excess emissions recorded. [MEDEP Chapter 117]

(19) **Lift Station Back-up Pump**

- A. The Mill shall limit the Lift Station Back-up Pump to 850 hr/yr of operation (based on a 12 month rolling total). An hour meter shall be maintained and operated on the Lift Station Back-up Pump. [MEDEP Chapter 138]
- B. A log documenting the dates and times of operation of the Lift Station Back-up Pump shall be kept. [MEDEP Chapter 140]
- C. The Lift Station Back-up Pump shall fire #2 fuel oil with a sulfur limit not to exceed 0.05% by weight. Compliance shall be based on fuel receipts from the supplier showing the quantity of fuel delivered and the percent sulfur of the fuel. [MEDEP Chapter 140]
- D. Emissions shall not exceed the following:

Pollutant	lb/MMBtu	Origin and Authority	Enforceability
PM	0.12	MEDEP, Chapter 103, Section 2(B)(1)(a)	Federally Enforceable

Pollutant	lb/hr	Origin and Authority	Enforceability
PM	0.8	MEDEP Chapter 140, BPT	Enforceable by State-only
PM ₁₀	0.8	MEDEP Chapter 140, BPT	Enforceable by State-only
SO ₂	0.4	MEDEP Chapter 140, BPT	Enforceable by State-only
NO _x	21.8	MEDEP Chapter 140, BPT	Enforceable by State-only
CO	5.8	MEDEP Chapter 140, BPT	Enforceable by State-only
VOC	0.6	MEDEP Chapter 140, BPT	Enforceable by State-only

- E. Visible emissions from the Lift Station Back-up Pump shall not exceed 20% opacity on a six (6) minute block average, except for no more than two (2) six (6) minute block averages in a continuous 3-hour period. [MEDEP Chapter 101]

(20) **LPG Dryer System**

- A. The LPG Dryer System is licensed to fire propane. The Mill shall keep records of the amount of propane fired in the LPG Dryer System on a 12 month rolling total basis. [MEDEP Chapter 140]

B. Emissions shall not exceed the following:

Pollutant	lb/MMBtu	Origin and Authority	Enforceability
PM	0.12	MEDEP, Chapter 103, Section 2(B)(1)(a)	Federally Enforceable

Pollutant	lb/hr	Origin and Authority	Enforceability
PM	0.09	MEDEP Chapter 140, BPT	Enforceable by State-only
PM ₁₀	0.09	MEDEP Chapter 140, BPT	Enforceable by State-only
SO ₂	0.004	MEDEP Chapter 140, BPT	Enforceable by State-only
NO _x	3.71	MEDEP Chapter 140, BPT	Enforceable by State-only
CO	0.93	MEDEP Chapter 140, BPT	Enforceable by State-only
VOC	0.07	MEDEP Chapter 140, BPT	Enforceable by State-only

(21) **PCC Plant**

A. Particulate emissions from the three carbonators shall be controlled with mist eliminators. In order to document maintenance of the demisters, a maintenance log recording the date and location of all malfunctions as well as all routine maintenance shall be kept on site. [MEDEP Chapter 140]

B. Emissions from each of the carbonator stacks shall not exceed the following:

Pollutant	lb/hr	Origin and Authority	Enforceability
PM	0.72	MEDEP Chapter 140, BPT	Federally Enforceable
PM ₁₀	0.72	MEDEP Chapter 140, BPT	Enforceable by State-only
SO ₂	14.4	MEDEP Chapter 140, BPT	Enforceable by State-only
NO _x	20.57	MEDEP Chapter 140, BPT	Enforceable by State-only
CO	1.84	MEDEP Chapter 140, BPT	Enforceable by State-only
VOC	0.3	MEDEP Chapter 140, BPT	Enforceable by State-only

C. Visible emissions from each of the carbonator stacks shall not exceed 10% opacity, based on a six (6) minute block average. [MEDEP Chapter 140]

D. Particulate emissions from the lime silo shall be vented through a baghouse and all components of the lime handling system shall be maintained so as to prevent PM leaks. [MEDEP Chapter 140]

E. In order to document maintenance of the baghouse, a maintenance log recording the date and location of all bag failures as well as all routine maintenance shall be kept on site. [MEDEP Chapter 140]

- F. Visible emissions from the lime silo baghouse shall not exceed 5% opacity on a six (6) minute block average. [MEDEP Chapter 140]
- G. Fugitive particulate emissions from the lime handling system shall not exceed 5% opacity on a six (6) minute block average. [MEDEP Chapter 140]

(22) RMP Mill

- A. The Mill shall maintain a 90% uptime on the condensation system on the RMP steam exhaust. [MEDEP Chapter 140]
- B. The Mill shall monitor and record the following for the RMP Mill when operating:

Parameter	Monitor	Record
RMP steam exhaust temperature	continuously	continuously

[MEDEP Chapter 140, BPT]

(23) Parts Washer

Parts washers that use a solvent degreaser containing greater than 1% VOC are subject to the operational and record keeping requirements of MEDEP Chapter 130 which include, but are not limited to, the following:

- A. The Mill shall keep records of the amount of solvent added to each parts washer. [MEDEP Chapter 130]
- B. The Mill shall equip each cold cleaning degreaser unit with a cover that is easily operated with one hand if [MEDEP Chapter 130]:
 - 1. the solvent vapor pressure is greater than 15 millimeters of mercury measured at 100 °F by ASTM D323-89; or,
 - 2. the solvent is agitated; or,
 - 3. the solvent is heated.
- C. The Mill shall attach a permanent conspicuous label to each cold cleaning degreaser unit summarizing the following operational standards [MEDEP Chapter 130]:
 - 1. Close the covers on all solvent degreasing tanks when the tanks are not in use;
 - 2. Drain the cleaned parts for at least fifteen (15) seconds or until dripping stops;
 - 3. If used, supply a solvent spray that is a solid fluid stream (not a fine, atomized or shower-type spray) at a pressure that does not exceed ten (10) pounds per square inch gauge pressure (psig);
 - 4. Do not degrease porous or absorbent materials, such as cloth, leather, wood or rope;

5. Minimize drafts to less than 40 meters/minute; and
 6. Refrain from operating the cold cleaning degreaser upon the occurrence of any visible solvent leak until such leak is repaired.
- D. The Mill shall not use any halogenated solvents in the degreasing tanks. [MEDEP Chapter 140, BPT]
- E. For those degreasers containing less than 1% VOC, the Mill shall keep the degreasers' Material Safety Data Sheets (MSDS) on file. [MEDEP Chapter 140, BPT]

(24) **Monitoring and Recordkeeping Requirements**
[MEDEP Chapters 140, 117, and 122]

- A. The following are identified as Periodic Monitors:
1. Fuel use for WB1, WB2, WB3, WB4, and the LPG Dryer System
 2. Delivery receipts or other records from the supplier indicating the percent sulfur by weight of the fuel oil for WB1, WB2, WB3, WB4, and the Lift Station Back-up Pump
 3. Hours of operation for the Lift Station Back-up Pump
 4. Logs of maintenance on lime silo baghouse
 5. Stack tests for PM every two years for WB1 and WB2 and upon request for WB3 and WB4.
- B. The following are identified as Parameter Monitors:
1. RMP steam exhaust temperature
- C. Each parameter monitor must record accurate and reliable data. If the parameter monitor is recording accurate and reliable data less than 98% of the source operating time within any quarter of the calendar year, the Department may initiate enforcement action and may include in that enforcement action any period of time that the parameter monitor was not recording accurate and reliable data during that quarter unless the licensee can demonstrate to the satisfaction of the Department that the failure of the system to record accurate and reliable data was due to the performance of established quality assurance and quality control procedures or unavoidable malfunctions. **Enforceable by State-only**
- D. For all CEMS and COMS recordkeeping shall include:
1. Documentation that all CEMS and COMS are continuously accurate, reliable and operated in accordance with Chapter 117, 40 CFR Part 51, Appendix P, and 40 CFR Part 60, Appendices B and F;
 2. Records of all measurements, performance evaluations, calibration checks, and maintenance or adjustments for each CEMS and COMS as required by 40 CFR Part 51 Appendix P;

3. A report of other data indicative of compliance with the applicable emission standards for those periods when the CEMS or COMS were not in operation or produced invalid data. In the event the Department does not concur with the licensee's compliance determination, the licensee shall, upon the Department's request, provide additional data, and shall have the burden of demonstrating that the data is indicative of compliance with the applicable standard.

(25) **Quarterly Reporting**

The licensee shall submit a Quarterly Report to the Bureau of Air Quality within 30 days after the end of each calendar quarter, detailing the following, for the control equipment, parameter monitors, Continuous Emission Monitoring Systems (CEMS) or Continuous Opacity Monitoring Systems (COMS) required by this license. [MEDEP Chapter 117]

- A. All control equipment downtimes and malfunctions;
- B. All CEMS or COMS downtimes and malfunctions;
- C. All parameter monitor downtimes and malfunctions;
- D. All excess events of emission and operational limitations set by this Order, Statute, state or federal regulations, as appropriate. The following information shall be reported for each excess event;
 1. Standard exceeded;
 2. Date, time, and duration of excess event;
 3. Maximum and average values of the excess event, reported in the units of the applicable standard, and copies of pertinent strip charts and printouts when requested;
 4. A description of what caused the excess event;
 5. The strategy employed to minimize the excess event; and
 6. The strategy employed to prevent reoccurrence.
- E. A report certifying there were no excess emissions, if that is the case.

(26) **Semiannual Reporting**

The licensee shall submit semiannual reports every six months to the Bureau of Air Quality. The semiannual reports are due on July 31st and Jan 31st of each year with the initial semiannual report due July 31, 2004. The postmarked date of the submittal shall be used to determine compliance with the timeliness of the semiannual reporting.

- A. Each semiannual report shall include a summary of the periodic monitoring required by this license.
- B. All instances of deviations from license requirements and the corrective action taken must be clearly identified and provided to the Department in summary form for each six-month interval.

[MEDEP Chapter 140]

(27) Annual Compliance Certification

The Mill shall submit an annual compliance certification to the Department in accordance with Standard Condition (13) of this license. The initial annual compliance certification is due January 31 of each year with the initial annual certification due January 31, 2005. The postmarked date of the submittal shall be used to determine compliance with the timeliness of the annual reporting. Certification of compliance is to be based on the stack testing or monitoring data required by this license. Where the license does not require such data, or the license requires such data upon request of the Department and the Department has not requested the testing or monitoring, compliance may be certified based upon other reasonably available information such as the design of the equipment or applicable emission factors. [MEDEP Chapter 140]

(28) Annual Emission Statement

In accordance with MEDEP Chapter 137, the licensee shall annually report to the Department the information necessary to accurately update the State's emission inventory by means of:

- 1) A computer program and accompanying instructions supplied by the Department;
- or
- 2) A written emission statement containing the information required in MEDEP Chapter 137.

Reports and questions should be directed to:

Attn: Criteria Emission Inventory Coordinator
Maine DEP
Bureau of Air Quality
17 State House Station
Augusta, ME 04333-0017

Phone: (207) 287-2437

The emission statement must be submitted as specified by Chapter 137.

(29) **Toxic Air Pollutants Emission Statement**

In accordance with MEDEP Chapter 137, the licensee shall report, in a timeframe designated by the Department, the information necessary to accurately update the State's toxic air pollutants emission inventory by means of a written emission statement containing the information required in MEDEP Chapter 137.

Reports and questions on the Air Toxics emissions inventory portion should be directed to:

Attn: Toxics Inventory Coordinator
Maine DEP
Bureau of Air Quality
17 State House Station
Augusta, ME 04333-0017

Phone: (207) 287-2437

(30) The licensee is subject to the State regulations listed below.

<u>Origin and Authority</u>	<u>Requirement Summary</u>	<u>Enforceability</u>
Chapter 102	Open Burning	-
Chapter 109	Emergency Episode Regulation	-
Chapter 110	Ambient Air Quality Standard	-
Chapter 116	Prohibited Dispersion Techniques	-
38 M.R.S.A. Section 3 §585-B, sub-§5	Reduce Mercury Use and Emissions	Enforceable by State-only

(31) **Units Containing Ozone Depleting Substances**

When repairing or disposing of units containing ozone depleting substances, the licensee shall comply with the standards for recycling and emission reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioning units in Subpart B. An example of such units include refrigerators and any size air conditioner that contain CFCs. [40 CFR, Part 82, Subpart F]

(32) The Mill shall pay the annual air emission license fee within 30 days of June 30th of each year. Pursuant to 38 M.R.S.A. Section 353-A, failure to pay this annual fee in the stated timeframe is sufficient grounds for revocation of the license under 38 M.R.S.A. Section 341-D, Subsection 3.

(33) **Certification by a Responsible Official**

All reports (including quarterly reports, semiannual reports, and annual compliance certifications) required by this license to be submitted to the Bureau of Air Quality must be signed by a responsible official. [MEDEP Chapter 140]

DONE AND DATED IN AUGUSTA, MAINE THIS DAY OF 2004.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: _____
DAWN R. GALLAGHER, COMMISSIONER

The term of this license shall be five (5) years from the signature date above.

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 10/7/97

Date of application acceptance: 10/20/97

Date filed with the Board of Environmental Protection: _____

This Order prepared by Lynn Ross, Bureau of Air Quality.